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July 15, 1998

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JUL 15 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Number Portability Query Services, CC Docket No. 98-14

Dear Ms. Salas:

Comcast Cellular Communications, Inc. ("Comcast"), by its attorneys, submits the attached Declaration of James Durcan with accompanying original signature page for incorporation into the above-referenced proceeding.

On July 10, 1998, Comcast filed its Opposition of Comcast Cellular Communications, Inc. to Direct Case of Bell Atlantic in response to the Commission's Order Designating Issues for Investigation in CC Docket No. 98-14. The Declaration of James Durcan attached to Comcast's opposition as Exhibit 1 contains a facsimile signature page. Comcast now submits Mr. Durcan's declaration with the original signature page.

Please inform me if any questions should arise in connection with this submission.

Respectfully submitted,

  
Laura H. Phillips

LHP/vas  
Enclosures

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DECLARATION OF JAMES DURCAN

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

1. My name is James Durcan. I am a Development Engineering Manager at Comcast Cellular Communications, Inc. ("Comcast"). I have a Bachelor's degree in electrical engineering from Stevens Institute of Technology. I also have a Master's degree in computer and information engineering from Stevens Institute of Technology. I have worked at Comcast for almost four years.
2. I am the development engineering manager responsible for overseeing the implementation of local number portability. Consequently, I am familiar with the technical issues surrounding the implementation of local number portability. Specifically, I am responsible for overseeing the facilities upgrades necessary to query ported numbers and implement local number portability.
3. As the person primarily responsible for Comcast's ability to query ported telephone numbers and to implement local number portability, I can attest that Comcast is committed to making the upgrades necessary for number portability as soon as possible.
4. Comcast's equipment vendor has informed Comcast that the software necessary to query ported numbers will not be delivered until the end of 1998.
5. The unavailability of the software necessary to query ported numbers will prove costly to Comcast. Until the software has been installed and the upgrade is operational, Comcast must compensate other carriers to process local number portability queries.
6. Like other wireless carrier networks, Comcast's network utilizes IS41 wireless signalling protocol. Bell Atlantic has informed Comcast that Comcast's network cannot interface with Bell Atlantic's querying database because Bell Atlantic's database currently utilizes only Advanced Intelligent Network ("AIN") protocol. To the best of Comcast's knowledge, Bell Atlantic's database software vendor, Tekelec, is in the process of revising its software to, among other things, support wireless triggers to number portability databases. This wireless capability is scheduled to become available in early 1999.
7. Comcast's ability to perform the queries necessary to route ported numbers and to implement local number portability for its own customers depends on software upgrades to Comcast's network facilities. Comcast's current software does not support these functionalities. To my knowledge, no provider of wireless switching facilities now offers the ability to meet number portability requirements.

8. Comcast has no feasible alternatives to obtaining a number portability upgrade to its current switching software. Comcast does not have the resources to support standalone development of this functionality in house or through an independent contractor. Thus, Comcast is dependent on its switch vendor to obtain number portability functionality. Without the necessary upgrades it is technically infeasible for Comcast to provide any number portability functionality.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 10, 1998



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James Durcan